

Exhibit I

Statement of Disputed Facts

Mr. Jeff Whitley has worked in the bath remodeling industry for approximately twenty-eight years. Ex. C, at ¶ 1. He first met Mr. Domanico in the mid-2000s when Mr. Whitley became the exclusive Canadian distributor of certain products for Luxury Bath Technologies Inc. *Id.* at ¶ 2. During this time, Mr. Whitley began developing his process for creating acrylic shower walls by removing grout line patterns from acrylic boards. *Id.* at ¶ 4. He also regularly collaborated with Mr. Domanico on technical advances in the bathtub tile space; for example, around 2014, they collaborated to develop a method of printing simulated marble patterns onto acrylic sheets. *Id.* They regularly shared testing samples and exchanged advice regarding improvements. *Id.* at ¶ 5.

In 2014, Mr. Domanico worked for Luxury Bath Technologies Inc. *Id.* Mr. Domanico and Mr. Whitley were working on a method of carving a tile pattern into a sheet of acrylic plastic to simulate a tile shower wall having a grout look. *Id.* at ¶ 7. In late 2014, during the testing of the product, Mr. Domanico gave Mr. Whitley product samples to which Mr. Whitley offered two suggestions: (1) to use a rounded bit, not the square bit that Mr. Domanico was using, and (2) to remove less material than Mr. Domanico's sample removed. *Id.* at ¶ 8. Mr. Whitley's contributions were conveyed in an in-person meeting as well as subsequently via email. Mr. Whitley routinely provided improvements to ideas that he and Mr. Domanico would co-develop. *Id.* Mr. Domanico never informed Mr. Whitley that he was filing for a patent on their collective ideas. *Id.* at ¶ 10. Upon receipt of BCI's demand in 2020, Mr. Whitley informed BCI that: (1) Milestone did not infringe, and (2) that he was a co-inventor of the '243 patent based on Mr. Whitley's suggestions to Mr. Domanico during the development phase in 2014. *Id.* at ¶ 11. Mr. Whitley's contribution can be found in claims 5 and 7 of the '243 patent and, despite not being present in the provisional application, formed the basis for distinguishing the claims of the '243 patent from the prior art.